

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

ROBYN KRAVITZ, *et al.*

Plaintiffs,

v.

U.S. DEPARTMENT OF COMMERCE, *et al.*

Defendants.

Civil Action No. 8:18-cv-01041-GJH

Hon. George J. Hazel

LA UNIÓN DEL PUEBLO ENTERO, *et al.*

Plaintiffs,

v.

WILBUR L. ROSS, in his official capacity
as U.S. Secretary of Commerce, *et al.*

Defendants.

Civil Action No. 8:18-cv-01570-GJH

Hon. George J. Hazel

PLAINTIFFS' RESPONSE TO DEFENDANTS' NOTICE OF RECENT FILING

In an apparent attempt to spook this Court moments before it rules on the merits of Plaintiffs' pending motion, Defendants have submitted a "Notice" attaching an inflammatory filing by defendants in the North Carolina redistricting case which levels various accusations about the conduct of the North Carolina plaintiffs' counsel with regard to Thomas Hofeller's files. The *Kravitz* and *LUPE* Plaintiffs' motion in *this* case, however, arose from the *public* filing of certain of those documents in the New York census citizenship question case, and Defendants have never suggested — nor is there any basis to conclude — that any of the documents on which Plaintiffs in *this* case rely are somehow privileged. If anything, the North Carolina defendants' filing confirms that the documents are indeed what Plaintiffs have stated they are —

materials from the files of Thomas Hofeller. Plaintiffs respectfully submit that the North Carolina filing therefore should not affect this Court's determination as to Plaintiffs' pending motion.

Dated: June 19, 2019

Respectfully Submitted,

/s/ Daniel Grant (Bar. No. 19659)

/s/ Denise Hulett

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CERTIFICATE OF SERVICE

I certify that on this 19th day of June 2019, I caused a copy of the foregoing filing to be sent to all parties receiving CM/ECF notices in this case.

By: /s/ Daniel T. Grant
Daniel T. Grant